

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

..... : **CHAPTER 13**  
**MICHAEL C. BOYLE** :  
Debtor : **CASE NO. 5-18-04529**  
.....

**DEBTOR'S RESPONSE TO  
TRUSTEE'S MOTION TO DISMISS**

Debtor Michael C. Boyle, through his undersigned counsel, hereby responds to the Trustee's Motion to Dismiss as follows:

1. Admitted.
2. Admitted.
3. Denied. The Chapter 13 Plan was filed on June 25, 2019. Strict proof of the averments is required at the time of trial.
4. Denied. Strict proof of the averments is required at the time of trial.

**WHEREFORE**, the debtor respectfully requests that this Honorable Court enter an Order denying the Relief requested by the Trustee and for such other and further relief is just and appropriate.

Respectfully submitted,

**CONWAY LAW OFFICES, P. C.**

/s/ Mark J. Conway  
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Attorney for Debtor

DATED: June 25, 2019

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**CERTIFICATE OF SERVICE**

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Trustee's Motion to Dismiss to be served via first class United States mail, postage prepaid and/or via e-mail:

Charles J. DeHart, III, Esq.  
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Hummelstown, PA 17036  
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**CONWAY LAW OFFICES, P.C.**

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DATED: June 25, 2019